



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 13, 2020

BY ECF

The Honorable Colleen McMahon
United States Chief District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Jonathan Skolnick, 19 Cr. 730 (CM)

Dear Judge McMahon:

The parties in the above captioned matter respectfully request that the conference scheduled for April 22, 2020, at 2:15 p.m. be adjourned at least 60 days. The adjournment would allow the Government to provide defense counsel with time to conduct an onsite review of additional discovery material that cannot be produced because of the Adam Walsh Child Protection and Safety Act. *See* 18 U.S.C. § 3509(m). This review has been delayed because of the COVID-19 pandemic.

The Government respectfully requests that time be excluded under the Speedy Trial Act between April 22, 2020, through the next-scheduled conference because the “ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A). The Government consulted with defense counsel, who does not object to the exclusion of time.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: _____ /s/ Rebecca T. Dell
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cc: Avraham C. Moskowitz, Esq. (By ECF)